

DECLARATION OF VICKI J. AZNARAN

I was involved with the Church of Scientology ("Scientology") for approximately 15 years. I submit this declaration on personal knowledge of the facts contained herein and if called upon as a witness I could and would competently testify thereto.

In 1978, after approximately four years as staff members, my husband and I joined the Sea Organization. From 1978 to early 1987, my husband and I worked most of our waking hours, with very few days off, at our various assignments within Scientology. I eventually became President of Religious Technology Center and, supposedly, the top "ecclesiastical" authority within Scientology. Richard was a high-level security officer. During this period my husband and I became intimately familiar with the structure and activities of various Scientology organizations. Among other things, I was briefed on and sometimes a participant in meetings involving litigation tactics and various means used to attack and fight "enemies" of Scientology. In numerous instances I was in the chain of command for approval for such activities. The legal strategy of Scientology and the existence of numerous potential legal problems, some of which are set forth below, were known to me when I was a staff member in Scientology.

Enemies of Scientology are deemed to be "suppressive persons" ("SPs"). One becomes a "suppressive person" by doing a suppressive act, such as suing Scientology as a litigant or lawyer. In the jargon of Scientology, when one is "declared" this means that one has been declared a "suppressive person" and,

therefore, may be harassed, hurt, damaged or destroyed without regard to truth, honesty or legal rights. It is considered acceptable within Scientology to lie, cheat, steal and commit illegal acts in the name of dealing with a "suppressive person."

This practice or policy is sometimes referred to as the policy of "fair game." In the jargon of Scientology, a person who is "declared" is understood to be a suppressive person. This means that the person is "fair game." The fair game policy was issued in the 1960s. It was never cancelled. A document was issued for public relations reasons that purportedly cancelled "fair game"; however, that document stated that it did not change the manner of handling persons declared "SP." In reality, the purported cancellation of fair game is at most a matter of semantics. Enemies of Scientology are treated as "fair game."

David Miscavige was the Chairman of the Board of Author Services Inc., ("ASI") in 1984 and 1985. ASI was incorporated to be the funnel through which profits from Scientology were channelled to Hubbard and, therefore, it was very important within Scientology. Miscavige represented Hubbard in all aspects of controlling Scientology. He attended regular meetings with myself and other top officials of Scientology organizations to review the status of all Scientology's activities including its litigation and dirty tricks campaigns against Scientology's enemies.

At one meeting in 1985 Miscavige told those present that all of Scientology should be more aggressive in their fair game attacks upon and injuries inflicted on Scientology's

enemies, especially squirrels. At that time Bent Corydon was a hated squirrel who vexed Scientology's leadership by his refusal to give up his outspoken position. He had been in litigation with Scientology for several years and refused to fold.

Although I never heard Miscavige order an attack against Corydon by name I knew and believe that everyone at that meeting knew that Corydon was included in Miscavige's directive because he was one of the best known and most troublesome defectors from Scientology.

Similarly, there could be no doubt that Miscavige meant that all types of attack be used, including physical attacks, defamation, and efforts to cause Corydon to go into bankruptcy.

Because of my position and the regular reports that came across my desk I know that throughout my presidency of RTC that fair game actions against enemies were commonplace. In addition to the litigation tactics described below, fair game activities included burglaries, assaults, disruption of enemies' businesses, spying, harassive investigations, abuse of confidential communications in parishioner files and so on. I specifically recall seeing one report regarding attacks against Bent Corydon after Scientology became aware that he was writing a book against Hubbard.

Other Hubbard writings encourage Scientologists to pursue litigation purely for harassment without regard to the merits of a claim to cause enemies to fold. Hubbard's writings state:

"The purpose of the suit is to harass and discourage rather than to win... The law can be used very easily to harass, and...will generally be sufficient

to cause [the enemy's] professional decease.
If possible, of course ruin him utterly."
Hubbard, "Magazine articles on Level 0
Checksheet" American Saint Hill Organization
1968. A true copy of the excerpt from "Magazine
Articles on Level 0 Checksheet" is attached
hereto as Exh. __.

Pursuant to this statement it has become the practice of Scientology's management to use litigation for harassment and to cause the financial ruin of adversaries as part of the fair game policy. This is made even worse by the fact that Scientology has, in name only, many "independent corporation."

The false representations that the numerous Scientology corporations are independent entities permits Scientology to harass its enemies by filing multiple lawsuits all directed by the same people all raising the same issues against the same defendants, while their lawyers fraudulently claim that the entities they are representing are independent. At the same time Scientology makes it a practice to refuse to produce almost all discovery, with the objective of increasing the litigation costs and causing delay. Furthermore Scientology often resorts to the destruction of evidence. I know this on personal knowledge because I participated in the destruction of files of ex-Scientists who were in litigation with the Church.

Although Author Services Inc. (ASI) has never to my knowledge appeared on any command chart distributed to Scientists, ASI is an integral part of Scientology and was for some time the controlling entity over all of Scientology along with RTC. Some of the facts on which I base this statement are stated in the next few paragraphs.

ASI was incorporated at about the same time as the massive restructuring of all Scientology organizations by high ranking Scientologists. The incorporators and original officers were all Scientologists, and ASI was specifically created to be the entity through which Hubbard could, and did, exercise control over Scientology money and receive huge payments.

At the October 1982 Mission Holders' Conference in San Francisco, the mission holders were ordered to increase their weekly payments (called "tithes") from 10% to 15% of their gross income. The additional 5% was to be used for a massive public relations campaign to increase the publicity for Hubbard's science fiction books. This was part of an overall plan to dramatically increase the visibility of Hubbard's name so that the market would be more receptive to a new public relations blitz promoting DIANETICS, the first stage in the selling of enormously expensive Scientology counselling and courses. The 5% payment increase was ordered by and its use controlled by ASI with the aid of Bridge Publications Inc. ("BPI").

The Scientology Managing Agents (Hubbard, Miscavige, Starkey, Spurlock and their handmaiden organizations; the Commodore's Messenger Organization, the Sea Organization, ASI, RTC, CSC and SMI) had de facto controlling power over all Scientology entities through the exercise of the coercive threat of the fair game policy. It was this threat that kept most Scientologists in line. This power could be maliciously exercised as, for example, at the Mission Holder's Conference of 1982 when a mission holder named Gary Smith was summarily

declared a suppressive person (thus subjecting him to fair game) because he refused to move from a rear seat in the conference room to a front seat.

ASI claims to represent not only Hubbard but other writers but its only real motive and activity is the promotion of Hubbard's writing, the expansion of Scientology and personal aggrandizement and power of the personalities who control Scientology. The only other writers it represented at all prior to my departure from Scientology in 1987 are those included in the annual volume of new writers of science fiction called Writers of the Future. This was its only non-exclusively Hubbard project and this project was mandated to be implemented by Hubbard to promote him as a patron of the arts.

As part of their attempt to expand and complete their control of Scientology and to gain control of valuable assets belonging to the missions, the managing agents ordered the independently incorporated missions to adopt new Articles and By-laws prepared by them under which the missions would have to submit to control by the managing agents acting principally through the Sea Org, RTC, CSI, and SMI, and the Commodore's Messenger Organization. While most missions succumbed to this power play, some, such as the Church of Scientology Mission of Riverside (COSMOR), under the leadership of Bent Corydon, did not.

From 1984 through early 1987, I was President of Religious Technology Center (hereinafter "RTC"). As President of RTC and a Sea Organization member, I attended many meetings concerning the

numerous legal actions involving Scientology organizations. During this time period, I had personal access to all legal documents having to do with RTC. I received a report every day on my computer that included a synopsis of each ongoing legal case involving Scientology. I received, or so I was told, copies of every major motion filed in cases involving Scientology, I was on the "approval lines" for legal documents dealing with RTC. During this time period, I had the option of attending legal meetings although some were mandatory. I attended many litigation meetings and became generally aware of Scientology's dirty tricks and legal maneuvers. On specifics, I frequently deferred to in-house and outside counsel, however, at least in theory, I was the head of RTC and had access to any business or litigation "secrets" of Scientology.

It is the stated policy and practice of Scientology to use the legal system to abuse and harass its enemies. This crude, fundamental directive of Scientology is no secret. The policy is to do anything and everything possible to harass the opposing litigant without regard to whether any particular motion or maneuver is appropriate or warranted by the facts or applicable law. That policy was followed in every legal case I was involved with or learned about while a member of the Sea Organization. The management of Scientology consistently expressed and demonstrated a complete disdain for the court system viewing it as nothing more than a method to harass enemies. Some examples of this are set forth below.

During litigation between Gerald Armstrong and Scientology,

which was before Judge Breckenridge of Superior Court for Los Angeles County, the court ordered the production of Armstrong's pre-clear ("PC") folders. These are files maintained by Scientology on those who submit to interrogation sessions in a process called auditing. During the course of that litigation I was ordered to go through Armstrong's folders and destroy or conceal anything that might be damaging to Scientology or helpful to Armstrong's case. As ordered, I went through the files and destroyed contents that might support Armstrong's claims against Scientology. This practice is known within Scientology as "culling PC folders" and is a common litigation tactic employed by Scientology.

During other litigation in Los Angeles known to me as the Wollersheim case, I was told that the judge had ordered the production of Wollersheim's folders. As ordered, I "culled" these files. In other words, I removed contents that might have been damaging to Scientology or support Wollersheim's claims against Scientology. For example, I removed evidence of events involving his family, the anguish this caused him, evidence of disconnection from family and evidence of fair game.

I was involved in numerous meetings concerning what is known to me as the Christofferson case in Portland, Oregon. This case was tried twice. In the first case, a Scientology witness by the name of Martin Samuels was coached and drilled for hours on how to lie convincingly or avoid telling the truth. Before or during the second trial he admitted to this course of conduct. In this litigation, a Scientologist by the name of Joan Shriver produced

responsive documents that may have been incriminating. This was a serious breach of policy for which she was punished. These documents were ordered produced on such short notice that apparently files were not thoroughly "culled." In another case, an attorney was severely criticized and almost fired for failing to properly coach and feed the desired answers to Heber Jentzsch. Mr. Jentzsch was, for public relations reasons, the purported head of the Church of Scientology International. During his deposition, Mr. Jentzsch was unable to answer fundamental questions concerning the management of Church of Scientology International.

In November, 1985, I was present at a meeting whereat Earle Cooley, a Scientologist lawyer, Lyman Spurlock and Norman Starkey, all high ranking Scientologists, announced that they were going to contact Judge Mariana Pfaelzer. Earlier that day Judge Pfaelzer had denied a Scientology motion for a temporary restraining order. After losing on the application there was a meeting to determine what to do about the situation. At the meeting Mr. Cooley had a file that purportedly contained background and personal information on Judge Pfaelzer. During the meeting Mr. Cooley and others announced that they were going to attempt to meet with Judge Pfaelzer that evening, at her house if necessary, concerning the litigation in which the temporary restraining order had been sought. Thereafter, Mr. Cooley and two others left with their file on Judge Pfaelzer. They returned several hours later at which time I was told that their attempts to contact Judge Pfaelzer had been unsuccessful.

In late 1979 and early 1980, there was a massive document destruction program undertaken to destroy any evidence showing that L. Ron Hubbard ("LRH") controlled Scientology. I participated in this activity in Clearwater, Florida and am informed that there was also intensive document destruction at facilities in Gilman Hot Springs, California. From at least that point onward there was a continuous effort to hide or destroy any evidence of Hubbard's control. For example, during an IRS investigation in 1984 and 1985, while in bed with pneumonia, I was ordered out of bed by Norman Starkey who told me that they had received a tip from a Los Angeles Police officer advising them of a pending IRS raid in Los Angeles. Mr. Starkey ordered me to go to a computer facility and insure that all information on the computers in Los Angeles that might show Hubbard's involvement and control of Scientology's money was destroyed except for one copy of each document. These copies were to be saved on computer discs which were to be hidden in secure storage places. At the time I was also instructed to destroy anything that would show the control of Mr. Starkey or Mr. Miscavige over Scientology.

I have been informed and believe that an improper affidavit was filed in a case brought by L. Ron Hubbard, Jr. in Riverside, California. The circumstances were as follows: The document purported to be an affidavit of L. Ron Hubbard. The signature of Hubbard was purportedly notarized by David Miscavige. It is my understanding that this affidavit caused the case to be dismissed. Subsequently, I was told by Pat Broecker, who had been

living with Hubbard at the time, and by Miscavige, that Miscavige had not seen Hubbard between 1980 and Hubbard's death in 1986. Accordingly, the affidavit was apparently signed, notarized and dated during a time period when Hubbard was in seclusion and not seen by the person who purportedly notarized the signature of Hubbard.

In or about 1981, while working in a Scientology organization known as the Guardian's Office, I had access to and observed various written and oral communication pertaining to illegitimate activities participated in by the Guardian's Office. The Guardian's Office attempted to infiltrate both governmental and private agencies including the IRS, the Department of Justice, and the American Medical Association and the National Institute of Mental Health. The purpose of this was to steal documents pursuant to Hubbard's "Snow White" program. The goal of this program was to eliminate any negative reports about Hubbard and Scientology that may have been held by these various agencies.

While involved in Scientology I became aware of various operations directed against an author who had written a negative book about Scientology. The author, Paulette Cooper, was subjected to various forms of harassment. One operation included an attempt to frame her. A false bomb threat was written. Scientology agent lifted a fingerprint from Cooper's apartment. These fingerprints were then transferred to the bomb threat letter. Ms. Cooper was subjected to an investigation and was not cleared until an FBI raid resulted in the seizure of Scientology

documents that exposed the operation as a frame-up. There was at least one other operation directed against Ms. Cooper. The substance of it was to plant a boyfriend to reinforce and play upon her suicidal tendencies in the hopes that she would commit suicide.

In 1976 and 1977, the then Mayor of Clearwater, Florida, Gabe Cazares was involved with litigation against Scientology. Arrangements were made to have an attorney by the name of Merrill Vanniere, a Scientologist, represent Mr. Cazares and sabotage his case. This plot was also exposed by documents obtained in an FBI raid of a Scientology facility. Also, in response to Mr. Cazares' litigation against Scientology, an attempt was made to implicate Mr. Cazares in a staged hit-and-run accident.

During the time period of my involvement with Scientology, I also learned of various attempts to influence judges or force their removal from cases. For example, a private investigator named Dick Bast obtained a statement from a prostitute concerning involvement with a certain judge in Washington, D.C. who was sitting on a Scientology case. This was then publicized. The judge did not continue on the case. The same investigator, Dick Bast was also hired for the purpose of attempting to force the removal of a judge in Tampa, Florida. This involved what I know as the Burden case, which was civil litigation brought by attorney Michael Flynn. Dick Bast secured a yacht and attempted to get the judge on board for the purpose of filming him under compromising circumstances. The judge declined to go yachting and the operation was unsuccessful. Approximately \$250,000.00

was spent on the operation.

I have been informed by Mark (Marty) Rathbun, a high ranking Scientologist, that his private investigator, Gene Ingram, "fed" a confession to Ala Tamimi when visiting him in an Italian prison. This false confession was, in substance, that Tamimi had been involved in a bad check scam involving an account of L. Ron Hubbard. This false confession implicated attorney Michael Flynn in the check scam. Michael Flynn was at the time considered a major enemy of Scientology because he represented numerous clients with claims against Scientology. This purported confession was used to slander and attack Michael Flynn. Michael Flynn has also been sued by Scientology as part of its "strategy" for handling enemies.

During an IRS criminal investigation in the 1984 to 1985 time period, the IRS ordered production of various communications between Hubbard and Author Services, Inc. (ASI). The ASI staff worked literally day and night for several days reviewing documents so that unfavorable documents could be destroyed or otherwise concealed from the IRS. Lyman Spurlock and Marion M. Dendue, Scientologists involved in this operation, informed me of this operation. Also during this IRS investigation, my husband, Rick Aznaran, was ordered to remove and conceal any incriminating documents from certain locations. He was also directed to make the computer network "raid proof." This involved creating a system where incriminating documents could be deleted from computer storage rapidly and before the IRS could obtain control over the computers.

In 1985, I attended a conference on "squirrels" attended by Miscavige, Starkey, Spurlock, and McShane, members of top management, and others. In Scientology jargon, "squirrels" are people who use or practice some procedures also used by Scientology but who do not submit to the total control of the Scientology organization and, perhaps most importantly, who do not pay a percentage of their auditing or counseling fees to Scientology. At this meeting, David Miscavige ordered that public Scientologists be organized and motivated to physically attack squirrels and disrupt their operations. This was stated to be pursuant to the standard guidelines of Scientology. Pursuant to such directives, efforts were undertaken to intimidate and disrupt these persons and their organizations.

I declare under penalty of perjury that the above is true and correct to the best of my belief.

Executed on July 19, 1990 at ^{Dallas}~~Los Angeles~~,
California, TX. MA

Vicki J. Aznaran
VICKI J. AZNARAN

[Signature]
NOTARY PUBLIC